

skill would therefore understand that the private network connecting one site with another *distant or remote* site is a WAN, not a LAN. It follows that the private network interfaces 706 are interfaces to WANs, not to LANs.

Likewise, the application treats LANs – when they are present – as something located within a site. See, e.g., page 3 line 20 (“LANs at each site 102”). Accordingly, “A site interface 702 connects the controller 502 to the LAN at the site 102.” Page 13 lines 21-22. When a LAN is present, the LAN interface in the claimed controller 502 (Figure 7) is thus the *site* interface 702, *not* a private network interface 706.

The discussion of Figure 6 on page 12 also refers to “WAN ports of the routers 104 on each frame cloud 106”. This reinforces the understanding of one of skill that private networks 106 (page 4 line 5), such as frame relay networks 106 (page 5 line 5), are WANs rather than LANs.

One of skill would also understand that LANs are optional (see page 17 lines 16-17, and note also that the term “site interface” was used for part 702 rather than “LAN interface” to allow the possibility that no LAN is present at a particular site). By contrast, private networks are not optional – they are always present in the context of the claimed invention because a purpose of the invention is to access them. It follows that LANs are not private networks, because if they were they would be simultaneously optional and mandatory, which does not make sense.

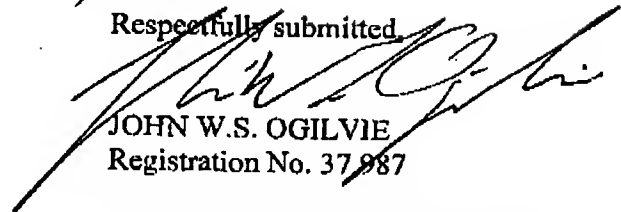
Conclusion

In light of the above, Applicants and Assignee respectfully submit that all pending claims are allowable. They request that the rejections be withdrawn, and that the claims be allowed and passed to issue. Their silence here does not signify agreement or acquiescence in the Office Action’s assertions, and they reserve all arguments. No additional fee is believed due. However, the Commissioner is authorized to charge any additional fee or to credit any overpayment in connection with this paper to Deposit Account No. 20-0100.

If allowance is not forthcoming by the end of June, an appeal will be filed. If there are questions, the Examiner is invited to call the undersigned.

DATED this 25th day of May, 2004.

Respectfully submitted,



JOHN W.S. OGILVIE
Registration No. 37,987

THORPE NORTH & WESTERN, LLP
Customer No. 20,551
P.O. Box 1219
Sandy, Utah 84091-1219
801-566-6633 (voice)
801-566-0750 (fax)